

REMARKS/ARGUMENTS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-13 are pending in this case.

In the outstanding Office Action, Claims 1-5, 8, 9, 12, and 13 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kurita, in view of Ala-Luukko, et al. (U.S. Patent No. 6,934,285 B1, herein “Ala-Luukko”); Claim 6 was rejected under 35 U.S.C. § 103(a) as unpatentable over Kurita, in view of Ala-Luukko, further in view of Maufer, et al. (U.S. Patent No. 7,120,930 B2, herein “Maufer”); Claim 7 was rejected under 35 U.S.C. § 103(a) as unpatentable over Kurita, in view of Ala-Luukko and Maufer, further in view of Ogawa, et al. (U.S. Patent No. 6,208,653 B1, herein “Ogawa”); and Claims 10 and 11 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kurita, in view of Ala-Luukko, further in view of Angwin, et al. (U.S. Patent No. 6,167,450, herein “Angwin”).

Applicants respectfully request that the IDSs filed on June 9, 2008 and on June 30, 2008 be considered by the examiner and indicated as such in the next Office Action.

Applicants respectfully traverse the rejections of the claims.

Claim 1 is directed to a gateway device and includes:

a receiver configured to receive control information, required for providing a plurality of services, from the service control device, the control information including rules or policies defined for each of the plurality of services; and  
an information processor configured to perform a predetermined information process for a signal received from the mobile communication network or the external network based on the control information, wherein each rule or policy included in the control information specifies processing for the signal.

The outstanding Office Action asserts, at pages 3 and 4, that Kurita teaches every element of Claim 1 except “a plurality of service types with rules or policies relating to the

service types and specifying processing of a service request signal,” which it asserts Ala-Luukko as teaching.

When a combination of references is asserted as teaching every element of a claim, both the asserted modification, or how the references are combined, as well as the asserted motivation for the combination, or why one of ordinary skill in the art would combine the references, must be specified in the rejection. MPEP § 706.02(V) sets out the requirement for asserting the modification. As to the asserted motivation, the Court recently reiterated the requirement of MPEP § 2143.01 by stating that a “patent composed of several elements is not proved obvious merely by demonstrating that each element was, independently, known in the prior art.” KSR Int. Co. v. Teleflex Inc., 82 USPQ2d 1385, 1389 (2007). The Court stated the importance of identifying “a reason that would have prompted a person of ordinary skill in the art to combine the elements as the new invention does.” *Id.*

In this case, the outstanding Office Action proposes, at page 5, to “combine a gateway receiving control information...with each rule or policy specifying processing for a signal, as suggested by Ala-Luukko et al., with the system and method of Kurita et al., with the motivation being to allow a gateway to translate messages of multiple different service types from a format compatible with a service control device to a format compatible with an external network.”

However, the issue of the propriety of combining Kurita and Ala-Luukko under the guidelines set forth above is not even reached in this case because the combination of Kurita and Ala-Luukko does not teach or suggest every element of Claim 1.

Kurita describes communication between a mobile station and a content provider that requires less overhead than TCP/IP. Kurita describes a conventional gateway, as described at paragraph [0004] of the published application, that relays packets between the mobile communication network and an IP network, but the gateway of Kurita does not perform

processes for changing service, for example, from a service to provide present location to a service to search businesses in the present location, in the gateway device. Further, Kurita, as conceded by the outstanding Office Action, does not teach or suggest a plurality of services or rules and policies defined for each of the plurality of services.

Ala-Luukko describes a method and system for modification of intelligent network parameters. As described at columns 1 and 2 of Ala-Luukko, a terminal device connected to a second telecommunication network can be used to send a fixed-format message to modify a service data parameter and/or service logic of the intelligent network. The gateway connecting the second telecommunication network to the service logic of the service control point and/or to the service data point uses a table to convert the fixed-format message of the second telecommunications network to a message format supported by the intelligent network.

However, Ala-Luukko does not cure the deficiencies of Kurita with regard to Claim 1 that are conceded by the outstanding Office Action. The fixed-format message sent by the second telecommunications network of Ala-Luukko does not include “rules or policies” but, rather, service logic or service parameters to change the services available to the terminal device. Thus, the fixed-format message described by Ala-Luukko does not teach or suggest control information as defined by Claim 1. Additionally, the list referred to by the outstanding Office Action, defining the type of message being transmitted, not only fails to teach or suggest a control information as defined by Claim 1 but is also not “received” by the gateway but, rather, is described as “a list in the gateway,” as column 5, line 7, of Ala-Luukko.

Further, even if Ala-Luukko did, *arguendo*, teach control information as defined by Claim 1, Ala-Luukko describes conversion, or the same process, for every received fixed-format message rather than “a predetermined information process...based on the control

information,” because a conversion does not teach or suggest a different process each time that different information is being converted.

Because Kurita and Ala-Luukko, even if properly combined, do not teach or suggest at least the above-discussed features of Claim 1, Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) of Claim 1 and Claims 2-5, 8, 9, and 13, which depend therefrom, be withdrawn.

Claims 6, 7, 10, and 11 depend from Claim 1 and, therefore, patentably define over Kurita and Ala-Luukko for at least the same reasons as Claim 1. Further, Maufer, which is additionally asserted against Claim 6; the combination of Maufer and Ogawa, which is additionally asserted against Claim 7; and Angwin, which is additionally asserted against Claims 10 and 11, do not cure the deficiencies of Kurita and Ala-Luukko with regard to Claim 1. Thus, Applicants respectfully request that the rejections under 35 U.S.C. § 103(a) of Claims 6, 7, 10, and 11 be withdrawn.

Amended Claim 12 is directed to a method of processing a signal in a gateway device and includes, *inter alia*, “**receiving...a signal defining various rules or policies...determining** a service type, from one of a plurality of service types, and a **destination requested by a service request signal by the various rules or policies** distributed from the service control device for the service request signal received from the mobile communication network or the external network, **wherein each rule or policy relates to one of the plurality of service types and specifies processing of the service request signal.**”

Thus, Claim 12 patentably defines over Kurita and Ala-Luukko for similar reasons as discussed above with regard to Claim 1, and, accordingly, Applicants respectfully request that the rejection of Claim 12 under 35 U.S.C. § 103(a) be withdrawn.

Consequently, in light of the above discussion, the present application is believed to be in condition for allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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